

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DENYONNA N. REED	§	CIVIL ACTION
	§	
Plaintiff,	§	
	§	
V.	§	COMPLAINT 5:22-cv-00068
	§	
I.Q. DATA INTERNATIONAL, INC.	§	
	§	
Defendant.	§	

**DEFENDANT IQ DATA INTERNATIONAL, INC.’S MOTION
TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS**

Defendant IQ Data International, Inc. (“Defendant” or “IQ Data”) files Motion to Extend Deadline to File Dispositive Motions and requests this Court to enter an Order extending the dispositive motion deadline to December 9, 2022. In support thereof, IQ Data would respectfully show the Court as follows:

1. On June 6, 2022, this Court entered its Scheduling Order [Dkt. No. 17], ordering the parties to file all dispositive motions by October 10, 2022.
2. Due to scheduling conflicts, the parties agreed to extend the September 9, 2022 discovery deadline.¹ Both parties recently served their responses to the opposing party’s written discovery requests and Plaintiff’s deposition is currently scheduled for October 21, 2022.²
3. IQ Data respectfully request that the deadline to file all dispositive motions be extended to December 9, 2022. This would also allow both parties to file their dispositive motions after Plaintiff’s deposition.

¹ The Scheduling Order [Dkt. No. 17] permits the parties to continue discovery beyond the deadline by agreement.

² Both parties served their written discovery responses on September 28, 2022.

4. The requested extension is not for purposes of delay. Good cause exists for the extension and no party will be prejudiced by the requested extension.

5. Plaintiff's counsel is unopposed to the filing of this motion.

IQ Data respectfully requests that this Court to enter an Order extending the dispositive motion deadline to December 9, 2022.

Respectfully submitted,

SERPE ANDREWS, PLLC

By: /s/ Lee H. Staley

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**ATTORNEYS FOR DEFENDANT
I.Q. DATA INTERNATIONAL, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of October, 2022, a true and correct copy of the above was electronically filed with the court via CM/ECF system and notification of such filing will be sent to all attorneys of record.

/s/ Lee H. Staley

Lee H. Staley